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7 Attorneys for Defendant
Cadence Design Systems, Inc.

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 AHMED HIGAZI, individually and on behalf
14 of all others similarly situated,

15 Plaintiff,

16 vs.

17 CADENCE DESIGN SYSTEMS, INC.,

18 Defendant.

No. C-07-CV-2813-JW

**DECLARATION OF COMPLIANCE
WITH THE CLASS ACTION FAIRNESS
ACT OF 2005**

1 I, Molly A. Harcos, declare:

2 1. I am admitted to the Bar of this Court, an associate at Paul, Hastings, Janofsky & Walker
3 LLP ("Paul Hastings"), and one of the attorneys representing defendant Cadence Design Systems, Inc.
4 ("Cadence"), in this action. I make this declaration to show Cadence's compliance with the notice
5 requirements of the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 ("CAFA"). I have personal
6 knowledge of the facts set forth in this declaration and could and would competently testify to them
7 under oath if called as a witness.

8 2. On February 27, 2008, plaintiff Ahmed Higazi and Cadence (collectively, the "Parties")
9 filed their joint motion for preliminary approval of the settlement reached between the Parties.

10 3. On March 5, 2008, seven days after the Parties' joint motion for preliminary approval
11 was filed, Paul Hastings' staff acting under my direction served on the appropriate federal and state
12 officials notice of the proposed settlement in this action pursuant to CAFA, 28 U.S.C. § 1715(b) (the
13 "March 5 CAFA Notice").

14 4. The March 5 CAFA Notice included the following:

- 15 a. A cover letter, providing notice of the scheduled judicial hearing (pursuant to
16 CAFA, 28 U.S.C. § 1715(b)(2)), addressed to the appropriate federal or state
17 official. (Attached to this declaration as Exhibit A as an exemplar is a true and
18 correct copy of the cover letter addressed and mailed to the Attorney General of
19 the United States.)
- 20 b. Notice of Proposed Settlement (pursuant to CAFA, 28 U.S.C. § 1715(b)(3)(B)).
21 (This document is on file with the Court as part of Docket No. 52(6).)
- 22 c. Plaintiff's complaint (pursuant to CAFA, 28 U.S.C. § 1715(b)(1)). (This
23 document is on file with the Court as Docket No. 1.)
- 24 d. The Parties' settlement agreement (pursuant to CAFA, 28 U.S.C. § 1715(b)(4)).
25 (This document is on file with the Court as part of Docket No. 52.)
- 26 e. The Parties' proposed notice to the class, including the Notice of (1) Proposed
27 Class Settlement and (2) Final Settlement Approval Hearing; Claim Form; and
28 Election Not to Participate in Settlement Form (pursuant to CAFA, 28 U.S.C.

1 § 1715(b)(3)(A)-(B)). (These documents are on file with the Court as part of
2 Docket No. 52(3)-(5).)

3 f. A list of class members identified from Cadence's records as residing, or having
4 resided, in each state and the estimated proportionate share of the claims of such
5 class members to the entire settlement (pursuant to CAFA, 28 U.S.C.
6 § 1715(b)(7)).

7 5. The cover letter listed the contents of the March 5 CAFA Notice, explained its format,
8 and was addressed to the appropriate federal or state official. Pursuant to CAFA, 28 U.S.C. § 1715(a),
9 which defines the appropriate federal and state officials to whom service must be made, the cover letter
10 was addressed to and the CAFA Notice was served on the Attorney General of the United States and the
11 Attorneys General of each state where a Class Member was found to reside (collectively, the "Attorneys
12 General").

13 6. The March 5 CAFA Notice was provided to each Attorney General in paper; the
14 remaining items were provided in portable document format ("PDF") on CD.

15 7. On March 7, 2008, Paul Hastings' staff acting under my direction filed a Certificate of
16 Service of CAFA Notice, including the names and addresses of the Attorneys General served. (This
17 document is on file with the Court as part of Docket No. 53.)

18 8. On March 12, 2008, this Court entered its Order granting preliminary approval of the
19 proposed settlement and scheduling the final approval hearing for July 11, 2008.

20 9. On March 17, 2008, Paul Hastings' staff acting under my direction served on the
21 appropriate Attorneys General a supplemental notice, informing them of the court's March 12, 2008,
22 Order and related deadlines (the "March 17 CAFA Notice").

23 10. The March 17 CAFA Notice included the following:

24 a. A cover letter, providing notice of the scheduled judicial hearing, addressed to the
25 addressed to the Attorneys General. (Attached to this declaration as Exhibit B as
26 an exemplar is a true and correct copy of the cover letter addressed and mailed to
27 the Attorney General of the United States.)

28 ///

1 b. Supplemental Notice of Proposed Settlement (pursuant to CAFA, 28 U.S.C.
2 § 1715(b)(3)(B)). (Attached to this declaration as Exhibit C is a true and correct
3 copy of the Supplemental Notice of Proposed Settlement.)

4 11. On March 18, 2008, Paul Hastings' staff acting under my direction filed a Certificate of
5 Service of Supplemental CAFA Notice, including the names and addresses of the Attorneys General
6 served. (This document is on file with the Court as part of Docket No. 58.)

7 12. On April 1, 2008, on the Parties' Stipulation to Amend Class Definition and Settlement
8 Payment in Joint Stipulation of Class Settlement and Related Documents (the "Stipulation to Amend"),
9 the Court approved an amendment to the Parties' settlement to include five additional positions as
10 "Covered Positions" within the scope of the settlement and to add \$164,856.61 to the settlement
11 payment that Cadence will make under the Settlement. (This document is on file with the Court as part
12 of Docket No. 60.)

13 13. On April 25, 2008, the Court entered its First Amended Order granting preliminary
14 approval of the proposed settlement and rescheduling the final approval hearing for July 7, 2008.

15 14. On May 6, 2008, Paul Hastings' staff acting under my direction served on the appropriate
16 federal and state officials notice of the amended settlement in this action pursuant to 28 U.S.C. section
17 1715 (b)(5) (the "May 6 CAFA Notice").

18 15. The May 6 CAFA Notice included the following:

19 a. A cover letter, providing notice of the scheduled judicial hearing, addressed to the
20 addressed to the Attorneys General. (Attached to this declaration as Exhibit D as
21 an exemplar is a true and correct copy of the cover letter addressed and mailed to
22 the Attorney General of the United States.)

23 b. The Stipulation to Amend the Settlement, including, in redline, the amended
24 settlement documents (pursuant to CAFA, 28 U.S.C. § 1715(b)(4)-(5)). (These
25 documents are on file with the Court as part of Docket No. 59.)

26 c. The First Amended Order granting preliminary approval of the proposed
27 settlement. (This document is on file with the Court as part of Docket No. 63.)

28 ///

1 d. An updated list of class members identified from Cadence's records as residing,
2 or having resided, in each state and the estimated proportionate share of the
3 claims of such class members to the entire settlement (pursuant to CAFA, 28
4 U.S.C. § 1715(b)(7)).

5 16. The May 6 CAFA Notice was provided to each Attorney General in paper; the remaining
6 items were provided in portable document format (PDF) on CD.

7 17. On May 7, 2008, Paul Hastings' staff acting under my direction filed a Declaration of
8 Service of Supplemental CAFA Notice, including the names and addresses of the Attorneys General
9 served. (This document is on file with the Court as part of Docket No. 64.)

10 18. Apart from the agreements listed above, the Parties have not entered into any other
11 agreement or settlement; final judgment or notice of dismissal have not been entered in this action; and
12 no written judicial opinion relating to the material described in CAFA, 28 U.S.C. § 1715(b)(3) to (6) has
13 been issued. Accordingly, those provisions of CAFA appearing at 28 U.S.C. section 1715(b)(6) and (8)
14 do not apply to this action and none of the CAFA Notices identified above includes any document under
15 these sections.

16 19. As of today's date, I have not received any comments or objections to the settlement from
17 the Attorneys General, and to the best of my knowledge and belief, no such comment or objection has
18 been filed with this Court.

19 I declare under penalty of perjury that the above is true and correct.

20 Executed on June 19, 2008, at San Francisco, California.

21
22 /s/
Molly A. Harcos

EXHIBIT A

Paul Hastings

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March 5, 2008

38562.00003

VIA U.S. MAIL

Hon. Michael Mukasey
Attorney General of the United States
U.S. Department of Justice
Robert F. Kennedy Building
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

**Re: Notice of Proposed Settlement in *Higazi v. Cadence Design Systems, Inc.*,
U.S.D.C., N.D. Cal., No. 07-2813-JW**

Dear Attorney General Mukasey:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, defendant Cadence Design Systems, Inc. ("Cadence"), provides notice of the parties' proposed settlement in the above-titled action. In accord with its obligations under CAFA, Cadence encloses the following documents:

1. Notice of Proposed Settlement, including notice of the scheduled judicial hearing for preliminary approval on March 10, 2008, at 10:00 a.m., at the United States District Court for the Northern District of California, Courtroom 8, 3rd Floor, 280 South First Street, San Jose, California 95113.
2. A copy of plaintiff Ahmed Higazi's complaint in the above-titled action, filed on May 30, 2007.
3. The parties' Joint Stipulation of Class Settlement and Class Settlement Agreement and Release (the "Settlement").
4. The forms of notification sent to class members of the Settlement, which include the Notice of (1) Proposed Class Settlement and (2) Final Settlement Approval Hearing (attached as Exhibit B to the Settlement), the Claim Form (attached as Exhibit C to the Settlement), and the Election Not to Participate in Settlement form (attached as Exhibit D to the Settlement).

Paul Hastings

Hon. Michael Mukasey
March 5, 2008
Page 2

5. A list of class members identified from Cadence's available records as residing, or having resided, in each state and the estimated proportionate share of the claims of such members to the entire Settlement.

The Notice of Proposed Settlement (item 1 above) is enclosed with this letter. In the interest of reducing the volume of paper, the remaining items (2 through 5 above) are provided electronically as PDF files on the enclosed CD. Should you desire any of these items by paper, please contact me by telephone or email, and we will happily provide a paper copy.

With respect item 5 above, please note that the data are organized in alphabetical order by state, and then within each state in alphabetical order by each class member's last name. For each state, the data include the total number of class members whose last known residential addresses are in that state, and the aggregate percentage recovery for all class members whose last known residential addresses are in that state as a percentage of the total recovery. The data also include each class member's name, Cadence employee identification number, and estimated proportionate recovery as a percentage of the total settlement.

If you have questions about this notice, the lawsuit or the enclosed materials, or if you do not receive any of the above-listed materials, please feel free to contact me. Thank you for your attention to this matter.

Sincerely,



Molly A. Harcos
of Paul, Hastings, Janofsky & Walker LLP
Attorneys for Defendant
Cadence Design Systems, Inc.

MH:ca

Enclosures

cc: Kelly M. Dermody, Counsel for Plaintiffs (w/o encls.)
Jahan C. Sagafi, Counsel for Plaintiffs (w/o encls.)
James M. Finberg, Counsel for Plaintiffs (w/o encls.)
Peter E. Leckman, Counsel for Plaintiffs (w/o encls.)

EXHIBIT B

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March 17, 2008

38562.00003

VIA U.S. MAIL

Hon. Michael Mukasey
Attorney General of the United States
U.S. Department of Justice
Robert F. Kennedy Building
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

Re: Supplemental Notice of Proposed Settlement in *Higazi v. Cadence Design Systems, Inc.*, U.S.D.C., N.D. Cal., No. 07-2813-JW

Dear Attorney General Mukasey:

On March 5, 2007, pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, defendant Cadence Design Systems, Inc. ("Cadence"), provided notice of the parties' proposed settlement in the above-titled action.

Please take notice that, on March 12, 2007, the U.S. District Court for the Northern District of California entered the order granting preliminary approval of the proposed settlement (attached to this letter under tab 1), and scheduling the judicial hearing for final approval on July 11, 2008, at 8:00 a.m., at the U.S. District Court, Courtroom 8, 3rd Floor, 280 South First Street, San Jose, California 95113.

Please take further notice that the Court ordered that oppositions to the motion for final approval must be filed by June 30, 2008. Accordingly, Cadence provides the updated Notice of Proposed Settlement, which reflects the June 30, 2008, date for filing comments on the settlement (attached to this letter under tab 2).

If you have questions about this notice, the lawsuit or the enclosed materials, or if you do not receive any of the above-listed materials, please feel free to contact me.

Paul Hastings
ATTORNEYS

Hon. Michael Mukasey
March 17, 2008
Page 2

Thank you for your attention to this matter.

Sincerely,



Molly A. Harcos
of Paul, Hastings, Janofsky & Walker LLP
Attorneys for Defendant
Cadence Design Systems, Inc.

MH:ca

Enclosures

cc: Counsel for Plaintiff:
Kelly M. Dermody
Jahan C. Sagafi
James M. Finberg
Peter E. Leckman
(w/o encls.)

EXHIBIT C

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Attorneys for
 Plaintiff Ahmed Higazi

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Attorneys for
 Defendant Cadence Design Systems, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

AHMED HIGAZI, on behalf of himself and a
 class of those similarly situated,

Plaintiff,

v.

CADENCE DESIGN SYSTEMS, INC.,

Defendant.

No. C-07-2813-JW

**SUPPLEMENTAL NOTICE OF PROPOSED
 SETTLEMENT**

28 U.S.C. § 1715

PLEASE TAKE NOTICE that the parties to the above-referenced class action have reached a proposed settlement of the claims at issue in the litigation. Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, defendant Cadence Design Systems, Inc. ("Cadence"), provides this notice to the Attorney General of the United States of America and the appropriate state official in each state in which a class member resides. On March 5, 2008, Cadence enclosed the following in accordance with its notice obligations under 28 U.S.C. section 1715(b):

1. Plaintiff's complaint in the above-titled action.
2. The parties' Settlement Agreement.
3. The parties' proposed Notice of (1) Proposed Class Action Settlement and (2) Final Settlement Approval Hearing, which includes information about the scheduled judicial hearing in the above-titled action.
4. The parties' proposed Election Not to Participate in Settlement Form.
5. The parties' proposed Claim Form.
6. The names of Class Members who reside in each state and the estimated proportionate share of the claims of Class Members in each state to the entire settlement.

PLEASE TAKE FURTHER NOTICE that the U.S. District Court for the Northern District of California held a judicial hearing for preliminary approval on March 10, 2008, at 10:00 a.m., at the U.S. District Court, Courtroom 8, 3rd Floor, 280 South First Street, San Jose, California 95113, and issued its order granting preliminary approval of the settlement on March 12, 2008.

PLEASE TAKE FURTHER NOTICE that the Court scheduled a judicial hearing for final approval on July 11, 2008, at 8:00 a.m., at the U.S. District Court, Courtroom 8, 3rd Floor, 280 South First Street, San Jose, California 95113.

PLEASE TAKE FURTHER NOTICE that pursuant to CAFA you are not required to comment on the settlement. However, if you wish to comment, please file your comments by **June 30, 2008** electronically (the Court provides information about its electronic case filing system at <http://ecf.cand.uscourts.gov>) or in hard copy form to Clerk of Court, San Jose Division, United States District Court, Northern District of California, 280 South 1st Street, San Jose, California 95133. If you

choose to comment, please also provide notice to the parties' counsel as follows:

CLASS COUNSEL

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Jahan C. Sagafi (Cal. State Bar No. 224887)
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CADENCE'S COUNSEL

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mollyharcos@paulhastings.com

If you have questions about this notice, the underlying action, or the enclosed materials, please contact counsel for plaintiff Ahmed Higazi and/or counsel for defendant Cadence as provided above.

Dated: March 17, 2008.

M. KIRBY C. WILCOX
JEFFREY D. WOHL
MOLLY A. HARCOS
PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: _____

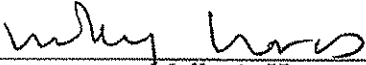

Molly A. Harcos
Attorneys for Defendant
Cadence Design Systems, Inc.

EXHIBIT D

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38562.00003

May 6, 2008

VIA U.S. MAIL

Hon. Michael Mukasey
Attorney General of the United States
U.S. Department of Justice
Robert F. Kennedy Building
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

Re: Supplemented Notice of Proposal Settlement in *Higazi v. Cadence Design Systems, Inc.*, U.S.D.C., N.D. Cal., No. 07-2813-JW

Dear Attorney General Mukasey:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, on March 5, 2008, defendant Cadence Design Systems, Inc. ("Cadence"), gave you notice of the parties' proposed settlement in the above-titled action. Since then, the following developments in the case have taken place of which we wish to give you notice:

1. On March 12, 2008, the District Court granted preliminary approval of the settlement.
2. On April 1, 2008, on the parties' Stipulation to Amend Class Definition and Settlement Payment in Joint Stipulation of Class Settlement and Related Documents (the "Stipulation to Amend"), the District Court approved an amendment to the parties' settlement to include five additional positions as "Covered Positions" within the scope of the settlement and to add \$164,856.61 to the settlement payment that Cadence will make under the settlement.
3. On April 25, 2008, the District Court entered its First Amended Order (1) Conditionally Certifying Settlement Class and Collective Action, (2) Granting Preliminary Approval to Proposed Class Action Settlement

Paul Hastings

Hon. Michael Mukasey
May 6, 2008
Page 2

and Plan of Allocation, (3) Directing Dissemination of Notice and Claim Form to the Class; and (4) Setting Date for Fairness Hearing and Related Dates (the "First Amended Preliminary Order").

The fairness hearing, at which the District Court will be asked to grant final approval of the settlement, is scheduled for Monday, July 7, 2008, at 9:00 a.m. at the United States District Court for the Northern District of California, Courtroom 8, 3rd Floor, 280 South First Street, San Jose, California 95113.

For your information, we enclose copies of:

1. The Stipulation to Amend (which includes, in redline, the amended settlement documents);
2. The Court's Order granting the Parties' Stipulation to Amend;
3. The First Amended Preliminary Order; and
4. As updated based on the amended settlement, a list of class members identified from Cadence's available records as residing, or having resided, in each state and the estimated proportionate share of the claims of such members to the entire settlement. As with the prior version of the class list previously provided, please note that the data are organized in alphabetical order by state, and then within each state in alphabetical order by each class member's last name. For each state, the data include the total number of class members whose last known residential addresses are in that state, and the aggregate percentage recovery for all class members whose last known residential addresses are in that state as a percentage of the total recovery. The data also include each class member's name, Cadence employee identification number, and estimated proportionate recovery as a percentage of the total settlement.

In the interest of reducing the volume of paper, these items are provided electronically as PDF files on the enclosed CD. Should you desire any of these items by paper, please contact me by telephone or email, and we will happily provide a paper copy.

Paul Hastings

Hon. Michael Mukasey
May 6, 2008
Page 3

If you have questions about this notice, the lawsuit or the enclosed materials, or if you do not receive any of the above-listed materials, please feel free to contact me. Thank you for your attention to this matter.

Sincerely,



Molly A. Harcos
for Paul, Hastings, Janofsky & Walker LLP
Attorneys for Defendant
Cadence Design Systems, Inc.

MH:wp

Enclosures

cc: Kelly M. Dermody, Counsel for Plaintiff (w/o encls.)
Jahan C. Sagafi, Counsel for Plaintiff (w/o encls.)
James M. Finberg, Counsel for Plaintiff (w/o encls.)
Peter E. Leckman, Counsel for Plaintiff (w/o encls.)